

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Docket Ref. No. 1014

**NOTICE OF FILING OF OFFER OF SETTLEMENT AND OF ORDER INSTITUTING
CEASE-AND-DESIST PROCEEDINGS PURSUANT TO SECTION 8A OF THE
SECURITIES ACT OF 1933 AND SECTION 21C OF THE SECURITIES EXCHANGE
ACT OF 1934, MAKING FINDINGS, AND IMPOSING A CEASE-AND-DESIST ORDER**

PLEASE TAKE NOTICE that that, on February 27, 2024, the Debtors filed the *Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 1014] (the “**Third Modified Plan**”).

PLEASE TAKE FURTHER NOTICE that the Third Modified Plan includes, as a condition to confirmation of the Third Modified Plan, that the Securities and Exchange Commission (the “**SEC**”) shall have issued that certain *Order Instituting Cease-and-Desist Proceedings Pursuant to Section 8A of the Securities Act of 1933 and Section 21C of the Securities Exchange Act of 1934, Making Findings, and Imposing a Cease-and-Desist Order* (the “**OIP**”) attached to that certain *Offer of Settlement* by Lordstown Motors Corporation (“**LMC**”) dated January 30, 2024 (as subsequently amended, the “**Offer**”).

PLEASE TAKE FURTHER NOTICE that a copy of the Offer submitted by LMC is attached hereto as **Exhibit A**.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

PLEASE TAKE FURTHER NOTICE that, on February 29, 2024, the SEC issued the OIP, a copy of which is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that the Debtors intend to present the attached Offer and OIP to the Court in connection with the confirmation hearing on the Third Modified Plan scheduled for **March 5, 2024 at 3:00 p.m. (ET)** before the Honorable Mary F. Walrath, United States Bankruptcy Court for the District of Delaware, via Zoom.

Dated: February 29, 2024
Wilmington, Delaware

/s/ Morgan L. Patterson

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